

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION, CLEVELAND

In re: ) CHAPTER 13  
Eric and Amy McCrann )  
Debtor(s) ) CASE NO. 07-15671  
                ) JUDGE: Pat E. Morgenstern-Claren  
                )

Mr. and Mrs. McCrann's Response in Opposition to the Trustee's Objection to Plan Confirmation

Mr. and Mrs. McCrann respectfully oppose the Trustee's objection to plan confirmation.

The Trustee states three bases:

First, the trustee states that he has not received a title for each vehicle and evidence of insurance for each vehicle. The trustee was supplied with title to the 1992 Mustang on August 31, 2007. The 2006 Ford Explorer is a leased vehicle which is being surrendered in this proceeding. The certificate of registration is attached. The certificate of registration identifies the vehicle, the owner, the status as a leased vehicle, and the identity of the lessors. The title to the 1999 Chevrolet S 10 Pick Up has not yet been supplied because the vehicle was a recent purchase. Proof of current insurance for all vehicles also is attached hereto.

Second, the trustee disagrees with the computation of disposable income.

Mr. and Mrs. McCrann stand by their computation of disposable income and disagree with the trustee's position.

Third, the trustee disagrees with the treatment of the surrendered real estate as an unsecured claim. It is impossible at this time to know how much, if any, the mortgage lender will receive for the sale of the collateral which secures the payment on the note. The collateral has defects which make sale unlikely; Mr. and Mrs. McCrann have been abandoned the real estate as unsafe to live in. Mr. and Mrs. McCrann believe their position is correct.

WHEREFORE, Mr. and Mrs. McCrann respectfully request that the trustee's objection to plan confirmation be overruled.

Respectfully submitted,

  
/s/Susan M. Gray (0062356)

Susan M. Gray -Attorney at Law  
Attorney for Eric and Amy McCrann  
21330 Center Ridge Road, #11  
Rocky River, Ohio 44116  
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Fax (440) 331-8160



**STATE OF OHIO - BUREAU OF MOTOR VEHICLES  
CERTIFICATE OF REGISTRATION**

PLATE NO.: DSB8338	REG. DATE: 02/20/2007	EXP. DATE: 02/20/2008	ISSUE DATE: 02/20/2007	APP NO.: 4428/0AN
VALIDATION NO.: B02DSB8338	ELECTRONIC POA			AGENCY: 4723
LESSOR NAME: ERIC A MCCRANN	LESSOR: CAB EAST LLC			USER ID: KJ
LESSOR ADDR: 47 EDGEWOOD DR	VEHICLE OWNERSHIP: LEASE			OLD APP NO.: 559394AC
CITY: GRAFTON	LESSOR ADDR: 260 INTERSTATE N CIR NW	OLD PLATE: DSB8338		
STATE: OH ZIP: 44044-1521	ADD. CITY: ATLANTA			
TAX DISTRICT: CARLISLE TOWNSHIP	ADD. STATE: GA	ADD. ZIP: 30339		
COUNTY: LORAIN				
INSIDE CORP LIMIT: NO	VEHICLE CLASS: PASSENGER			
VEHICLE YEAR: 2006	ODOMETER READING: 49			
BODY TYPE: SW	MAKE: FORD	STATE FEES:		
CERTIFICATE TITLE NO.: 4701739776	PLATE TYPE: SUNBURST			
VEH. SERIAL NO.: 1FMBU74E26UA76289	REG TYPE: RENEWAL	LOCAL TAX: \$		
PURCHASE DATE: 02/21/2005	SUSPENSION/REVOCATION: NO	REFL./CO. FEE: \$		
NEW	PRIOR OPERATION: YES	DEPUTY FEE: \$		
	FEES PAID: YES	TOTAL FEES: \$		

In Ohio, it is illegal to drive any motor vehicle without insurance or other financial responsibility (FR) coverage.

It is also illegal for any motor vehicle owner to allow anyone else to drive the owner's vehicle without FR coverage.

- PROOF OF COVERAGE IS REQUIRED:** Whenever a police officer issues a traffic ticket\* At all vehicle inspection stops\* Upon traffic court appearances\* Upon ran checks by the Registrar of Motor Vehicles.
- ANY DRIVER OR OWNER WHO FAILS TO SHOW PROOF OF INSURANCE OR OTHER COVERAGE WILL:** Lose his or her driver license for 90 days on first offense, one year on second offense\* Lose his or her license plates and vehicle registration\* Pay reinstatement fees of \$75.00 on first offense, \$250.00 for second offense and \$500.00 on any additional offense\* Pay a \$50.00 penalty for any failure to surrender his or her driver license, license plates or registration AND\* Be required to

RQ 86538

07/12/2007	07/12/2007	08/10/2007	ND002776	\$19.50	M731616
ERIC M MCCRANN					
13417 WHITEHEAD RD	LAGRANGE	OH	44085	1GCCT19WXX8186069	1999 CHEVROL 2.0C
					JRI COUNTY CARS INC.
					5033 DETROIT ROAD
					SHEFFIELD OH

07/12/2007

DATE



## AMERICAN NATIONAL PROPERTY AND CASUALTY CO

POLICY NUMBER

34-A-153-957-2

THIS AMENDED DECLARATION

POLICY TERM  
06-03-07 TO 12-03-07  
AND SUBSEQUENT RENEWALSREPLACES ALL PRIOR DECLARATIONS, IF ANY, AND WITH POLICY PROVISIONS  
AND ANY ENDORSEMENTS ISSUED TO FORM A PART THEREOF COMPLETES THIS  
FAMILY AUTOMOBILE POLICY.

CASHBACK

1949 E. SUNSHINE  
SPRINGFIELD, MISSOURI 65808-0001 (417) 887-0220

DISCOUNT(S): PASV RESTRNT, MULTI-CAR, P.A.C., TICKET-FREE, COMP-CLAIM FREE

CHANGE EFFECTIVE 07-13-07.

## NAMED INSURED AND P.O. ADDRESS

MCCRANN, ERIC M

47 EDGEWOOD DR

GRAFTON OH 44044-1521

CHNGS: VEH, COV, LIEN

## AGENT

FOR CUSTOMER SERVICE, CALL:

440-327-2533

DEREK BRINER

D8343-P 1-460

## RATED

NUM	DR	DESCRIPTION	ID NUMBER	SYM	BANDS	TERR	CLASS
1	2	1992 FOR MUSTANG CT CV	IFACP45E9NF145620	27	L3-P3	04	5VG02M
2	1	2006 FOR EXPLORER	IFMEU/4E26UA76289	08	L1-P2	04	5YG05D
3	0	1999 CHE S10 EXT CAB 4	1GCCT19WXX8186059	13	L3-P4	04	5WP02D

		1/AUTO	2/AUTO	3/PICKUP
A. BODILY INJURY LIABILITY	- - - PREMIUM	\$116.00	\$151.00	\$116.00
LIMIT PER PERSON		100,000	100,000	100,000
LIMIT PER OCCURRENCE		300,000	300,000	300,000
B. PROPERTY DAMAGE LIABILITY	- - - PREMIUM	\$70.00	\$90.00	\$70.00
LIMIT PER OCCURRENCE		100,000	100,000	100,000
UNINSURED MOTORISTS COVERAGE	- - - PREMIUM	\$43.00	\$43.00	\$56.00
LIMIT PER PERSON		100,000	100,000	100,000
LIMIT PER ACCIDENT		300,000	300,000	300,000
D. COMPREHENSIVE	- - - - - PREMIUM	\$28.00	\$16.00	\$19.00
DEDUCTIBLE PER OCCURRENCE		500	500	500
ADDED COVERAGE ENDORSEMENT		NO	NO	NO
E. COLLISION	- - - - - PREMIUM	\$105.00	\$139.00	\$84.00
DEDUCTIBLE PER OCCURRENCE		500	500	500
ADDED COVERAGE ENDORSEMENT		NO	NO	NO
K. REIM OF AUTO RENTAL EXPENSE	- - - PREMIUM	INCLUDED	INCLUDED	INCLUDED
LIMIT PER DAY		\$25	\$25	\$25
C. MEDICAL PAYMENTS	- - - - - PREMIUM	\$13.00	\$20.00	\$16.00
LIMIT PER PERSON		5,000	5,000	5,000
I. TOWING & LABOR/WINDSHIELD	- - - PREMIUM	\$9.00	\$9.00	\$9.00
LIMIT		100	100	100

TOTAL \$384.00 \$468.00 \$370.00

1 M MCCRANN ERIC M PRIN

2 F MCCRANN AMY PRIN

VEH 2 FORD MOTOR CREDIT  
PO BOX 5245 SPRINGFIELD OH 45501

VEH 3 ADDL INS/LIENHOLDER  
CREDIT ACCEPTANCE  
25505 W 12 MILE RD  
SOUTHFIELD MI 48034

VEH 1 CITI FINANCIAL  
1091 E BROAD ST  
ELYRIA OH 44035

SA281 POL 05-05 SA321 2 08-88 SA4050H 1,2,3 10-02

\$1,222.00 \$1,222.00

DATE PRINTED 07-13-07 69F-13-47

INSURED

AUTHORIZED REPRESENTATIVE

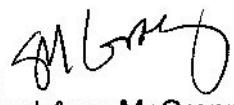
**SERVICE**

The undersigned certifies that a copy of the foregoing *Response in Opposition to the Trustee's Objection to Plan Confirmation* was served pursuant to the Court's electronic service system:

Office of the U.S. Trustee  
(served electronically)

Craig Shopneck, Chapter 13 Trustee  
(served electronically)

In addition, all other parties set  
on the Clerk of Court's electronic  
service list were served by the Clerk  
electronically.

  
/s/Susan M. Gray  
Attorney for Eric and Amy McCrann